CONSULTANTS

STS Consultants, Ltd. 750 Corporate Woods Parkway Vernon Hills, Illinois 60061-3153

fax web

voice 847-279-2500 847-279-2510 www.steconsultants.com

November 6, 2002

Ms. Verneta Simon, On-Scene Coordinator Mr. Fred Micke, On-Scene Coordinator US Environmental Protection Agency Region 5 77 W. Jackson Blvd., SE-5J Chicago, Illinois 60604-3590



Progress Report for October 2002 - 341 East Ohio Street - STS Project No. 1-25585-RE: XI, Correspondence No. 137

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V, Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during October 2002 and activities planned or expected during November 2002.

PROGRESS DURING OCTOBER 2002

Removal Action Field Activities

- Completed removal action field activities in Area 4 and obtained USEPA signoff.
- Completed removal of pesticide impacted soil and obtained verification analytical results.
- Obtained QAPP sign-off for Revision 3 from USEPA.
- Performed rough grading to fill excavations and cover any remaining concrete rubble

II. PLANNED FOR NOVEMBER 2002

- Obtain USEPA notice that all field work is complete and closure report can be prepared.
- Begin preparation of closure report.
- Replace construction fence with chain link fence cemented into the site.
- Place gravel cover over remainder of site.

Upon notice that all materials requiring removal have been removed from the site, STS will begin preparation of the Site Closure Report. Please advise us that all field work is complete and that the closure report should be prepared. We understand the closure report is due within 60 days of notice that all field work is complete.

¹ Please refer to weekly status reports for more detailed information concerning status of removal and extent of successful varification surveys.

U.S. Environmental Protection Agency STS Project No. 1-25585-XI, Correspondence No. 132 October 17, 2002 Page 2

Please contact us at 847-279-2500 with any questions you may have regarding this information.

Regards,

STS COMSULTANTS, LTD

John S. Esser, P.E., P.G. Senior Project Engineer

CC:

Timothy Ramsey, Piper Rudnick Harold Holmberg, Kerr-McGee Mark Krippei, Kerr-McGee Bernie Bono, Kerr-McGee Richard G. Berggreen, C.P.G. Principal Geologist

774 9. Dog

Thomas Pabian, Capri Capital Terry McKay, Capri Capital

P.01/03

STS Consultants, Ltd.

750 Corporate Woods Parkway Vernon Hills, IL 60061 Phone: (847) 279-2500 FAX: (847) 279-2510

FACSIMILE TRANSMISSION

()ate:	November 6, 2002				
To:	Fred Micke/Verneta Simon	USEPA		Fax #: 312-353-9176	
4	Timothy Ramsey	Piper Rudnick		Fax #: 312-630-7350	
	Harold Holmberg	Kerr-McGee		Fax#: 405-270-4112	
	Mark Krippel/Bernie Bono	Кеп-МсGee		Fax#: 630-231-3990	
	Thomas Pabian/TenyMcKay	Capri Capital		Fax #: 312-335-9365	
Pages	being transmitted, incl. Cover	. 2			_
CC:		Fax No.;			
From:	John Esser	Phone:	847-279-2500		
Re:	341 East Ohio Street Site				_
Urger	nt For Signature For Review	Please Comment/Reply	As Requested	Original to Follow	
Mess	nge:				

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STS Consultants, Ltd.

750 Corporate Woods Parkway Vernon Hills, IL 60061 Phone: (547) 279-2500 FAX: (847) 279-2510

FACSIMILE TRANSMISSION

Date:	October 17, 2002			
To:	Fred Micke/Verneta Simon	USEPA		Fax #: 312-353-9176
	Timothy Ramsey	Piper Rudnick		Fax #: 312-630-7350
	Harold Holmberg	Kerr-McGee	·	Fax #: 405-270-4112
	Mark Krippel/Bernie Bono	Kerr-McGee		Fax #. 630-231-3990
	Thomas Pabian/TerryMcKay	Capri Capital		Fax #: 312-335-9365
Pages	being transmitted, incl. Cover	: 3		
cc:		Fax No.:		
From:	John Esser	Phone:	847-279-2500	
Re:	341 East Ohio Street Site			
Urger	nt For Signature For Review	Please Comment/Reply	As Requested	Original to Follow
Mess:	age:			

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STS Consultants, Ltd. 750 Corporate Woods Parkway Vernon Hills, Illinois 60061-3153

voice 847-279-2500 fax 847-279-2510 web www.stsconsultants.com

October 17, 2002

Ms. Verneta Simon, On-Scene Coordinator Mr. Fred Micke, On-Scene Coordinator US Environmental Protection Agency Region 5 77 W. Jackson Blvd., SE-5J Chicago, Illinois 60604-3590

RE: Progress Report for September 2002 - 341 East Ohio Street - STS Project No. 1-25585-XI, Correspondence No. 132

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V, Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during September 2002 and activities planned or expected during October 2002.

I. PROGRESS DURING SEPTEMBER 2002

- Removal Action Field Activities Removal action field activities continued during September and generally consisted of Phase I and Phase II excavation/removal and pesticide-impacted soil removal activities in Areas 1, 2, 3, and 4. The removal activities included the following:
 - Stripping pavement.
 - Radiation survey of exposed fill soils.
 - Controlled excavation of radiological-impacted soils.
 - Loading of radiological-impacted soils into lined truck-mounted transport containers.
 - Off-site transport of radiological-impacted soils by Kerr-McGee for railroad transport to approved disposal facility.
 - Loading of pesticide-impacted soils into trucks for transport to an approved disposal facility.
 - Demolition, cleaning, frisking, and temporary stockpiling of subsurface foundation structures and floor slabs.
 - Test pit excavation and soil sampling/analysis of suspected pesticide-impacted shallow fill areas for the purpose of refining the extent of shallow pesticide contamination.
 - Verification sampling and analysis of Phase I excavation/removal areas.
 - Verification sampling and analysis of pesticide-impacted excavation/removal areas.
 - Verification sampling and analysis of Phase II excavation/removal areas.
 - Personal and area air monitoring.

¹ Please refer to weekly status reports for more detailed information concerning status of removal and extent of successful verification surveys.

U.S. Environmental Protection Agency STS Project No. 1-25585-XI, Correspondence No. 132 October 17, 2002 Page 2

II. PLANNED FOR OCTOBER 2002

- QAPP Revision 3 USEPA formal approval of QAPP.
- Removal Action Continue and complete removal action field work in Area 4. Complete re-excavation and re-sampling of pesticide-impacted soils at site grid coordinate H-6.
- Demobilization Perform rough-grading of site following completion of removal activities and successful verification sampling. Discontinue air monitoring. Demobilize site equipment and personnel.

Upon notice that all materials requiring removal have been removed from the site, STS will begin preparation of the Site Closure Report. Please advise us that all field work is complete and that the closure report should be prepared. We understand the closure report is due within 60 days of notice that all field work is complete.

Please contact us at 847-279-2500 with any questions you may have regarding this information.

Regards,

lin S. Esser, P.E., P.G.

Senior Project Engineer

Timothy Ramsey, Piper Rudnick Haroid Holmberg, Kerr-McGee Mark Krippel, Kerr-McGee Bernie Bono, Kerr-McGee

Richard G. Berggreen, C.P.G.

Principal Geologist

Thomas Pabian, Capri Capital Terry McKay, Capri Capital



STS Consultants, Ltd. 750 Corporate Woods Parkway Vernon Hills, Illinois 60061-3153

voice 847-279-2500 fax 847-279-2510 web www.stsconsultants.com

1.)

September 13, 2002

Ms. Verneta Simon, On-Scene Coordinator Mr. Fred Micke, On-Scene Coordinator US Environmental Protection Agency Region 5 77 W. Jackson Blvd., SE-5J Chicago, Illinois 60604-3590

RE: Progress Report for August 2002 - 341 East Ohio Street - STS Project No. 1-25585-XI, Correspondence No. 119

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V, Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during August 2002 and activities planned or expected during September 2002.

I. PROGRESS DURING AUGUST 2002

- QAPP Revision 3 Signature Page On 8/1/02, STS transmitted the last remaining signature page (from Argonne National Laboratory) for the QAPP, Revision 3.
- Removal Action Field Activities Removal action field activities continued during August
 and generally consisted of Phase I and Phase II excavation/removal and pesticide-impacted
 soil removal activities in Area 1 and Area 2. The removal activities included the following¹:
 - Stripping pavement.
 - Radiation survey of exposed fill soils.
 - Controlled excavation of radiological-impacted soils.
 - Loading of radiological-impacted soils into lined truck-mounted transport containers.
 - Off-site transport of radiological-impacted soils by Kerr-McGee for railroad transport to approved disposal facility.
 - Loading of pesticide-impacted soils into trucks for transport to an approved disposal facility.
 - Demolition, cleaning, frisking, and temporary stockpiling of subsurface foundation structures and floor slabs.
 - Test pit excavation and soil sampling/analysis of suspected pesticide-impacted shallow fill areas for the purpose of refining the extent of shallow pesticide contamination.
 - Verification sampling and analysis of Phase I excavation/removal areas.
 - Verification sampling and analysis of pesticide-impacted excavation/removal areas.
 - Verification sampling and analysis of Phase II excavation/removal areas.
 - Personal and area air monitoring.
- Modification to Removal Action Sequence STS submitted a letter to USEPA on 8/18/02 requesting approval of a modification to the removal action excavation sequence. The request was to allow completion of Phase I followed by Phase II at each remaining removal

¹ Please refer to weekly status reports for more detailed information concerning status of removal and extent of successful verification surveys.

U.S. Environmental Protection Agency STS Project No. 1-25585-XI, Correspondence No. 119 September 13, 2002 Page 2

> Area before proceeding to a subsequent Area. USEPA transmitted their approval of the requested removal sequence modification on 8/22/02.

- Pesticide Removal Verification In response to STS's letter to USEPA dated 7/30/02, the USEPA agreed to review and verify the successful completion of pesticide-impacted soil removal on an area-by-area basis (similar to the verifications provided by USEPA for radiological-impacted soil removal). A letter was received from USEPA on August 7, 2002 (erroneously dated July 7, 2002) indicating the verification to be provided by USEPA and the requested supporting documentation.
- Dewatering Test Pit Excavations Several test pit excavations were excavated in Area 4 to evaluate subsurface conditions as they relate to potential dewatering activities. Natural sand soils were encountered in the test pit excavations at depths that were comparable to Area 1. Deeper foundations were not observed in the test pit excavations. Consequently, it appears that it may be possible to perform Phase I and Phase II removal activities in Area 4 without extensive dewatering.
- Public Meeting At the request of USEPA, STS and TRS attended a public meeting at the City of Chicago Department of Environment on 8/8/02.
- Removal Action Schedule We estimate the removal action field activities will continue through September and possibly into early October. Assuming removal action field activities are completed by 10/11/02, the total duration would be approximately 18 weeks, or approximately 6 weeks beyond the originally scheduled 12-week duration.

II. PLANNED FOR SEPTEMBER 2002

- QAPP Revision 3 STS requests that USEPA provide final approval of the QAPP, Revision The QAPP was transmitted to USEPA on 7/12/02 and the outstanding signature page was transmitted on 8/1/02.
- Removal Action Continue removal action field work. Phase I and Phase II excavation activities will continue into Areas 2 and 3 and begin in Area 4. In addition, pesticideimpacted soil excavation/removal will continue in Areas 1 and 2.

Please contact us at 847-279-2500 with any questions you may have regarding this information.

Regards.

S. Esser, P.E., P.G.

%€nior Project Engineer

CC:

Timothy Ramsey, Piper Rudnick Harold Holmberg, Kerr-McGee Mark Krippel, Kerr-McGee Bernie Bono, Kerr-McGee

Richard G. Berggreen, C.P.G.

Principal Geologist

Thomas Pabian, Capri Capital Terry McKay, Capri Capital

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STS Consultants, Ltd.

Date: September 13, 2002

750 Corporate Woods Parkway Vernon Hills, IL 60061 Phone: (847) 279-2500 FAX: (847) 279-2510

FACSIMILE TRANSMISSION

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To:	Fred Micke/Verneta Simon	USEPA		Fax#: 312-353-9176
	Timothy Ramsey	Piper Rudnick		Fax # 312-630-7350
	Harold Holmberg	Kerr-McGee		Fax#: 405-270-4112
- - · · · · · · · · · · · · · · · · · ·	Mark Krippel/Bernie Bono	Kerr-McGee		Fax #: 630-231-3990
	Thomas Pabian/TerryMcKay	Capri Capital		Fax #: 312-335-9365
Pages	being transmitted, incl. Cover	: 3		
CC:		Fax No.:	•	
From:	John Esser	Phone:	847-279-2500	
Re:	341 East Ohio Street Site		····	
∐ Urgen	t For Signature For Review	Please Comment/Reply	☐ As Requested	Original to Follow
Messa	ge:			•

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STS Consultants, Ltd.

750 Corporate Woods Parkway Vernon Hills, IL 60061 Phone: (847) 279-2500 FAX: (847) 279-2510



FACSIMILE TRANSMISSION

Date:	August 22, 2002				
To:	Fred Micke/Vemeta Simon	USEPA		Fax#.	312-353-9176
	Timothy Ramsey	Piper Rudnick	·	Fax#:	312-630-7350
	Harold Holmberg	Kerr-McGee		Fax#:	405-270-4112
	Mark Knippel/Bernie Bono	Kerr-McGee		Fax#:	630-231 - 3990
	Thomas Pabian/TemyMcKay	Capri Capital		Fax#:	312-335-9365
Pages	being transmitted, incl. Cover:	4		****	
CC:		Fax No.:			
From:	John Esser	Phone:	847-279-2500		3
Re:	341 East Ohio Street Site				
☐ Urger	★ ☐ For Signature ☐ For Review	Please Comment/Reply	As Requested	Original	to Follow
Mess	age:				

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IF YOU DO NOT RECEIVE ALL PAGES, PLEASE CALL (847) 279-2500 IMMEDIATELY



STS Consultanta, Ltd. 750 Corporate Woods Parkway Vernon Hills. Illinois 60061-3153 voice 847-279-2500 fax 847-279-2510 web www.stsconsultants.com

August 22, 2002

Ms. Verneta Simon, On-Scene Coordinator Mr. Fred Micke, On-Scene Coordinator US Environmental Protection Agency Region 5 77 W. Jackson Blvd., SE-5J Chicago, Illinois 60604-3590

RE:

Progress Report for July 2002 - 341 East Ohio Street - STS Project No. 1-25585-XI, Correspondence No. 111

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V. Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during July 2002 and activities planned or expected during August 2002.

I. PROGRESS DURING JULY 2002

- MWRDGC Discharge Permit MWRDGC issued a letter dated 22 July 2002 that provides conditional approval of STS's application for a one-time discharge permit for dewatering system effluent.
- Amended Work Plan A compilation of the approved Amended Work Plan is ready for printing pending receipt of USEPA final approval of the QAPP.
- QAPP STS transmitted four copies of QAPP Revision 3 (13 June 2002) to USEPA on 12
 July 2002 requesting final approval. A correction to Appendix C of the QAPP was issued to
 USEPA on 16 July 2002. The one remaining signature page (from Argonne National
 Laboratory) was transmitted to USEPA on 1 August 2002.
- Removal Action Field Activities Removal action field activities continued during July and generally consisted of Phase 1 and Phase 2 excavation/removal and pesticide-impacted soil removal activities in Area 1 (south and southwest portion of site). The removal activities included the following¹:
 - Stripping pavement.
 - Radiation survey of exposed fill soils.
 - Controlled excavation of radiological-impacted soils.
 - Loading of radiological-impacted soils into lined truck-mounted transport containers.
 - Off-site transport of radiological-impacted soils by Kerr-McGee for railroad transport to approved disposal facility.
 - Loading of pesticide-impacted soils into trucks for transport to an approved disposal facility.
 - Demolition, cleaning, frisking, and temporary stockpiling of subsurface foundation structures and floor slabs.

¹ Please refer to weekly status reports for more detailed information concerning status of removal and extent of successful verification surveys.

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U.S. Environmental Protection Agency STS Project No. 1-25585-XI, Correspondence No. 111 August 22, 2002 Page 2

- Test pit excavation and soil sampling/analysis of suspected pesticide-impacted shallow fill areas for the purpose of refining the extent of shallow pesticide contamination.
- Verification sampling and analysis of Phase 1 excavation/removal areas.
- Verification sampling and analysis of pesticide-impacted excavation/removal areas.
- Verification sampling and analysis of Phase 2 excavation/removal areas.
- Personal and area air monitoring.
- Modification to Removal Action Sequence USEPA transmitted conditional approval of the removal sequence modification described in STS's letter dated 8 July 2002. The approved modification enabled the contractor to reduce the number of times equipment and material must be re-located on-site.
- Removal Action Schedule In the weekly status report dated 30 July 2002, STS reported that the removal action may continue for an additional 4 to 6 weeks, translating into 20 to 30 days longer than the 12 weeks originally scheduled. As previously reported, greater than anticipated volumes of radiological-impacted soil and reinforced concrete foundation elements were encountered in Area 1. In addition, pesticide-impacted soils have been encountered over a wider extent in Area 1 than originally anticipated.

We anticipate that removal activities will be completed in Area 1 by 16 August 2002. This represents just over 10 weeks since the start of work on 6 June 2002. Phase 1 and Phase 2 excavation/removal in Areas 2, 3, and 4 remain to be completed. In addition, dewatering activities may need to be employed in Area 4. We currently estimate the removal action field activities will probably extend through September and possibly into early October. Assuming removal action field activities are completed by 11 October 2002, the total duration would be approximately 18 weeks, or approximately 6 weeks beyond the originally scheduled 12-week duration.

II. PLANNED FOR AUGUST 2002

- Amended Work Plan and Related Documents Photocopy and distribute complete sets of final Work Plan following receipt of formal final approval of the QAPP from USEPA.
- Department of Sewers Pumping/Discharge Permit STS will retain a licensed drainlayer for permit application submittal to Department of Sewers a minimum of approximately 2 weeks prior to start of pumping/discharge.
- Removal Action Continue removal action field work. Phase 1, Phase 2 and pesticideimpacted soil excavation/removal in Area 1 will likely be completed by 16 August 2002. Work will continue with Phase 1 excavation/removal in Areas 2 and 3 during late August.
- Public Meeting USEPA notified STS of a public meeting schedule for 8 August 2002 at the
 City of Chicago Department of Environment. USEPA requested STS and TRS attendance at
 the meeting.

Please contact us at 847-279-2500 with any questions you may have regarding this information.

Regards,

STS CONSULTANTS, LTD.

John S. Esser, P.E., P.G. Senior Project Engineer

Richard G. Berggreen, C.P.G.

PUS. Bgg

Principal Geologist

 U.S. Environmental Protection Agency
 STS Project No. 1-25585-XI, Correspondence No. 111 August 22, 2002 Page 3

cc: Timothy Ramsey, Piper Rudnick Harold Holmberg, Kerr-McGee Mark Krippel, Kerr-McGee Bernie Bono, Kerr-McGee Thomas Pabian, Capri Capital
Terry McKay, Capri Capital



July 11, 2002

Ms. Verneta Simon, On-Scene Coordinator Mr. Fred Micke, On-Scene Coordinator US Environmental Protection Agency Region 5
77 W. Jackson Blvd., SE-5J Chicago, Illinois 60604-3590

RE: Progress Report for June 2002 - 341 East Ohio Street - STS Project No. 1-25585-XI, Correspondence No. 094

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V, Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during June 2002 and activities planned or expected during July 2002.

I. PROGRESS DURING JUNE 2002

- MWRDGC Discharge Permit A meeting with MWRDGC to discuss permitting of discharge of water from future excavation dewatering sumps/wells took place on June 17, 2002. MWRDGC concluded that the groundwater can be appropriately permitted as a one-time discharge under their sewer ordinance. We understand a permit will be issued by MWRDGC at the completion of the Phase I removal work. A letter of confirmation was issued by STS to the MWRDGC on June 24, 2002.
- Amended Work Plan A compilation of the approved Amended Work Plan was reviewed by Piper Rudnick and is being prepared for printing and distribution to removal action participants.
- QAPP USEPA transmitted a letter dated June 4, 2002 requesting corrections and signatures to the latest version of the QAPP. The requested corrections are completed. STS is awaiting a final signature from RSSI and Argonne National Laboratory.
- Health & Safety Training Held a one-day pre-construction Health & Safety meeting at Time-Life building on June 5, 2002. The meeting was attended by personnel from STS, Kerr McGee, Budron, Envirocon, Double M Trucking, and SAHCI, and USEPA. Presentations were given by STS (Site History, Site Operations, Health & Safety), Hawks Logistics (DOT requirements), and SAHCI (Radiation Safety).
- Removal Action Mobilization STS and Budron mobilized to the site on June 5 and commenced removal action field activities on June 6, 2002.
- Removal Action Field Activities Removal action field activities during June generally
 consisted of Phase 1 excavation/removal activities in Area 1 (south and southwest portion of
 site). In general, the removal activities included the following:
 - Stripping pavement.
 - Radiation survey of exposed fill soils.
 - Controlled excavation of radiological-impacted soils.

U.S. Environmental Protection Agency STS Project No. 1-25585-XI, Correspondence No. 094 July 11, 2002 Page 2

- Loading of radiological-impacted soils into lined truck-mounted transport containers.
- Off-site transport of radiological-impacted soils by Kerr-McGee for railroad transport to approved disposal facility.
- Demolition, cleaning, frisking, and temporary stockpiling of subsurface foundation structures and floor slabs.
- Test pit excavation and soil sampling/analysis of suspected pesticide-impacted shallow fill areas for the purpose of refining the extent of shallow pesticide contamination.
- Verification sampling and analysis of Phase 1 excavation/removal areas.
- Personal and area air monitoring.
- Proposed Modification to Removal Action Sequence STS submitted a letter to the USEPA, dated June 25, 2002, requesting permission to complete Phase 2 excavation and screening in Area 1 when Phase 1 removal had been completed. The request was modified by STS pursuant to its letter dated July 8, 2002 to USEPA. The Work Plan modification as proposed in these two STS letters will enable the contractor to reduce the number of times equipment and material must be re-located on-site. The modification will also allow Area 1 to be backfilled and covered to minimize dust generation from wind on the exposed soil. The proposed modification represents a departure from the anticipated removal sequence and requires USEPA approval prior to implementation.

II. PLANNED FOR JULY 2002

- QAPP Submit corrected QAPP to USEPA for final approval.
- Amended Work Plan and Related Documents Photocopy and distribute complete sets of final Work Plan.
- MWRDGC Discharge Permit STS is awaiting issuance of the MWRDGC discharge permit as requested in the June 24, 2002 letter to MWRDGC.
- Department of Sewers Pumping/Discharge Permit STS will retain a licensed drainlayer for permit application submittal to Department of Sewers a minimum of approximately 2 weeks prior to start of pumping/discharge. Depending on removal action progress, application for this permit may be postponed until August.
- Removal Action Continue removal action field work.

Please contact us at 847-279-2500 with any questions you may have regarding this information.

Regards,

STS CONSULTANTS, LTD.

John S. Esser, P.E., P.G.

Senior Project Engineer

cc: Timothy Ramsey, Piper Rudnick Harold Holmberg, Kerr-McGee Mark Krippel, Kerr-McGee Bernie Bono, Kerr-McGee Richard G. Berggreen, C.P.G.

Principal Geologist

Thomas Pabian, Capri Capital Terry McKay, Capri Capital



June 13, 2002

Ms. Verneta Simon, On-Scene Coordinator Mr. Fred Micke, On-Scene Coordinator US Environmental Protection Agency Region 5 77 W. Jackson Blvd., SE-5J Chicago, Illinois 60604-3590

RE:

Progress Report for May 2002 - 341 East Ohio Street - STS Project No. 1-25585-XI,

Correspondence No. 085

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V, Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during May 2002 and activities planned or expected during June 2002.

I. PROGRESS DURING MAY 2002

- General Continued preparation for the beginning of excavation.
- Project Status Meetings Meetings of STS project staff and a conference call between STS and Piper Rudnick took place during May to review project status and action items prior to start of field work.
- Wellpoint Dewatering System Drilling Permit Approval (OUC#25121) Met with Chicago Department of Transportation (CDOT) to review utility company responses to wellpoint permit application. Received permit issuance authorization for excavation from the CDOT on May 7, 2002.
- Truck Routes Obtained finalized truck routes for radiological-impacted and non-radiological impacted soil hauling from Kerr-McGee and Budron, respectively.
- Field Laboratory for Radionuclide Analysis Transmitted a letter dated April 1, 2002 to USEPA requesting approval of proposed field laboratory procedure for analysis of radionuclides.
- MWRDGC Discharge Permit TRS and MWRDGC continued discussions concerning the MWRDGC's classification of the dewatering system discharge. In the meantime, STS began preparing a Special Discharge Authorization Request pursuant to MWRDGC's April 10, 2002 letter. TRS submitted an appeal to MWRDGC on May 10, 2002 requesting review of their classification of the dewatering system effluent. STS delayed submittal of the Special Discharge Authorization request at request of MWRDGC pending issuance of a MWRDGC letter dated May 30, 2002.
- Excavation Contract A contract between Budron and TRS was finalized and signed.
- **Profile for Pesticide-Impacted Soil** Transmitted revised Generator's Profile to Waste Management for future disposal of non-radiological pesticide-impacted soil.
- **Profile for Petroleum-Impacted Soil** Obtained soil samples for characterization of non-radiological, non-pesticide, petroleum-impacted soil for disposal permitting. Transmitted Generator's Profile to Waste Management for future disposal.

U.S. Environmental Protection Agency STS Project No. 1-25585-XI, Correspondence No. 085 June 13, 2002 Page 2

- Amended Work Plan USEPA continued with their review of the Amended Work Plan documents. USEPA issued written approval of the Amended Work Plan in their letter dated May 15, 2002. A sample copy of the approved Work Plan Amendment was compiled and submitted to Piper Rudnick for review prior to production photocopying and distribution.
- Perimeter Drilling Report USEPA approval of the Perimeter Drilling Report was issued on May 31, 2002.
- Field Laboratory USEPA approval of the proposed field radiological laboratory was issued on May 31, 2002.
- . Mobilization/Removal Action Schedule Parties involved with the project action were notified of the scheduled start date for the removal action field work.
- Health & Safety Training Schedule Notification STS issued notification on May 31, 2002 to all removal action field participants requesting their attendance at project-specific health and safety training scheduled for June 5, 2002.

II. PLANNED FOR JUNE 2002

- . Amended Work Plan and Related Documents Photocopy and distribute complete sets of final Work Plan.
- Health & Safety Training Site-specific health and safety training for all removal action onsite personnel is scheduled for June 5, 2002.
- MWRDGC Discharge Permit A meeting is scheduled for June 17, 2002 to discuss MWRDGC's May 30, 2002 letter and to submit the Special Discharge Authorization request.
- Mobilize for Remediation Activities Removal action field activities are scheduled to begin on June 6, 2002.
- Department of Sewers Pumping/Discharge Permit Retain licensed drainlayer for permit application submittal to Department of Sewers a minimum of approximately 2 weeks prior to start of pumping/discharge.

Richard G. Berggreen, C.P.G.

Principal Geologist

• Removal Action - Continue removal action field work.

Please contact us at 847-279-2500 with any questions you may have regarding this information.

Regards,

CC:

STS CONSULTANTS, LTD.

John S. Esser, P.E., P.G. Sepior Project Engineer

Timothy Ramsey, Piper Rudnick Harold Holmberg, Kerr-McGee

Mark Krippel, Kerr-McGee Bernie Bono, Kerr-McGee Thomas Pabian, Capri Capital Terry McKay, Capri Capital





STS Consultants, Ltd. Solutions through Science & Engineering

April 5, 2002

Ms. Verneta Simon, On-Scene Coordinator Mr. Fred Micke, On-Scene Coordinator US Environmental Protection Agency Region 5 77 W. Jackson Blvd., SE-5J Chicago, Illinois 60604-3590

RE: Progress Report for March 2002 - 341 East Ohio Street - STS Project No. 1-25585-XG, Correspondence No. 072

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V, Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during March 2002 and activities planned or expected during April 2002.

I. PROGRESS DURING MARCH 2002

- Continued preparation for the beginning of excavation.
- MWRDGC Discharge Permit Made multiple follow-up calls to the MWRDGC concerning
 December 21, 2001 permit application for one-time discharge. During the most recent
 conversation with MWRDGC, they stated that they were re-evaluating which ordinance
 would govern the proposed discharge. MWRDGC stated that they would strive to resolve
 the issue and transmit the approval or any additional documentation requests during the first
 week of April.
- ComEd Utility Clearance (OUC#24207) Made multiple follow-up calls to ComEd concerning STS request for ComEd verification that no active service exists at project site. During the most recent conversation, ComEd stated that no active ComEd lines or equipment exists on-site and a letter documenting this finding would be issued.
- Department of Sewers Pumping/Discharge Permit Application Drafted the required application to the Chicago Department of Sewers for a pumping and discharge permit.
- Wellpoint Installation Permit Application (OUC#25121) Submitted a review request for protection of existing utilities to the Chicago Department of Transportation, Office of Underground Coordination for planned installation of the 32 wellpoints located within the interior of the project site (OUC#25121).
- Work Plan and Related Documents Issued the revised Work Plan documents to the USEPA for review and approval.
- Dewatering Cost Obtained revised cost estimate from dewatering contractor for the installation of the wellpoint system.
- Excavation Contract Continued work on finalization of the excavation contract with Budron.
- Plat of Survey Revision Arranged for revision to Plat of Survey by Chicago Guarantee Survey for addition of AT&T Broadband utility line information along Ohio Street.

U.S. Environmental Protection Agency STS Project No. 1-25585-XG, Correspondence No. 072 April 5, 2002 Page 2

• Waste Profile for Pesticide-Impacted Soil - Transmitted Generator's Waste Profile to Waste Management for future disposal of non-radiological pesticide-impacted soil.

II. PLANNED FOR APRIL 2002

- General Continue preparation for the beginning of excavation.
- Plat of Survey Revision Transmit updated Plat of Survey to Chicago Department of Transportation, Bureau of Inspection in support of excavation permit application (OUC#24207).
- Excavation Permit (OUC#24297) Anticipate receipt of approval from Department of Transportation.
- Wellpoint Permit (OUC# 25121) Meeting with DOT Bureau of Inspection during week of April 15, 2002 to review responses.
- MWRDGC Discharge Permit Continued follow-up with MWRDGC concerning status of one-time discharge permit request.
- Truck Routes Obtain finalized truck routes for radiological-impacted and non-radiological impacted soil hauling from Kerr McGee and Budron, respectively.
- Work Plan and Related Documents Compile and distribute complete sets of final Work Plan following receipt of USEPA Approval.
- Field Laboratory for Radionuclide Analysis Prepare request to USEPA for approval of proposed field laboratory procedure for analysis of radionuclides.
- Excavation Contract Finalize and execute excavation contract.
- Bonding Determine proportional share of DOT bonding for Budron and Kerr McGee.
- Mobilization Schedule Identify probable mobilization date(s) and start of excavation following finalization of excavation contract.
- Health and Safety Training Schedule and conduct safety training for all project personnel immediately prior to mobilization.
- Kerr McGee Pre-mobilization Notice Notify Kerr McGee a minimum of 2 weeks prior to mobilization.

III. OTHER FUTURE ACTIVITIES

 Department of Sewers Pumping/Discharge Permit - Retain licensed drainlayer for permit application submittal to Department of Sewers approximately 2 weeks prior to start of pumping/discharge (if required).

Please contact us at 847-279-2500 with any questions you may have regarding this information.

Regards,

STS CONSULTANTS, LTD.

John S. Essér P.E., P.G. Senior Project Engineer

Richard G. Berggreen, C. Principal Geologist

U.S. Environmental Protection Agency STS Project No 1-25585-XG, Correspondence No. 072 April 5, 2002 Page 3

cc: Timothy Ramsey, Piper, Marbury, Rudnick & Wolfe Harold Holmberg, Kerr-McGee Mark Krippel, Kerr-McGee Bernie Bono, Kerr-McGee Thomas Pabian, Capri Capital Terry McKay, Capri Capital



March 8, 2002

Ms. Verneta Simon, On-Scene Coordinator
Mr. Fred Micke, On-Scene Coordinator
US Environmental Protection Agency
Region 5
77 W. Jackson Blvd., SE-5J
Chicago, Illinois 60604-3590

RE: Progress Report for February 2002 - 341 East Ohio Street - STS Project No. 1-25585-XG, Correspondence No. 059

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V, Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during February 2002 and activities planned or expected during March 2002.

I. PROGRESS DURING FEBRUARY 2002

- Continued preparation for the beginning of excavation.
- Discussed details of dewatering proposal including work sequencing with the dewatering subcontractor and the general contractor.
- Met with the Board of Underground concerning the dewatering system revisions.
- Continued submitting written and telephone requests to ComEd to resolve remaining utility issues raised by the Board of Underground relative to the excavation permit approval.
- Completed the Perimeter Drilling Report and submitted report to USEPA.
- Completed the Pesticide Investigation Report and submitted report to USEPA.
- Worked on an amendment to the Removal Action Work Plan addressing the radiological clearance of the perimeter areas and the method of handling nonradiological soils with pesticide concentrations.
- Met with Chicago Department of Sewers to obtain discharge permit submittal requirements.
- Follow-up calls to MWRDGC concerning status of December 21, 2001 permit application for one-time discharge. Application still under review.

U.S. Environmental Protection Agency STS Project No. 1-25585-XG, Correspondence No. 59 March 8, 2002 Page 2

II. PLANNED FOR MARCH 2002

- Follow-up contact with MWRDG concerning December 21, 2001 permit application for one-time discharge (March 1, 2002).
- Submit to MWRDGC radiation chemist an excerpt of USEPA March 1, 2001 Action Memorandum concerning site history and copies of previous MWRDGC one-time discharge approvals provided to STS on similar past projects (March 4, 2002).
- Submit to ComEd a written request and site map identifying specific utility issues that remain outstanding and are to be addressed by ComEd pursuant to Board of Underground review of excavation permit (March 4, 2002).
- Continued follow-up with MWRDGC concerning status of one-time discharge permit request.
- Finalize draft of application to Chicago Department of Sewers for dewatering system discharge to City sewers.
- Continue to work on the amendment to the Removal Action Work Plan including amendment to Health and Safety Plan to cover the handling of pesticide-impacted soils
- Finalize excavation contract.
- Determine city bonding requirements with the Department of Transportation.
- Finalize pricing for the dewatering subcontractor.
- Continue preparation for the beginning of excavation.
- Conduct safety training for all project personnel prior to commencement of the excavation work.
- Submit an additional application to the Board of Underground covering the center line of wellpoints for dewatering. Meeting with Board of Underground to discuss submittal requirements and utilities affected schedule for March 11, 2002.

Please contact us at 847-279-2500 with any questions you may have regarding this information.

Regards,

44

STS CONSULTANTS, LTD.

Richard G. Berggreen, C.P.G.

Principal Geologist

cc: Timothy Ramsey, Piper, Marbury, Rudnick & Wolfe Harold Holmberg, Kerr-McGee Mark Krippel, Kerr-McGee Bernie Bono, Kerr-McGee Thomas Pabian, Capri Capital Terry McKay, Capri Capital



STS Consultants, Ltd. Solutions through Science & Engineering

February 13, 2002

Ms. Verneta Simon, On-Scene Coordin....ar Mr. Fred Micke, On-Scene Coordinator US Environmental Protection Agency Region 5 77 W. Jackson Blvd., SE-5J Chicago, Illinois 60604-3590

RE: Progress Report for January 2002 - 341 East Ohio Street - STS Project No. 1-25585-XG, Correspondence No. 053

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (ST\$) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V, Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during January 2002 and activities planned or expected during February 2002.

I. PROGRESS DURING JANUARY 2002

- Continued preparation for the beginning of excavation.
- Discussed details of dewatering proposal including work sequencing with the dewatering subcontractor and the general contractor.
- Submitted revised QAPP to USEPA
- Met with the Board of Underground concerning the dewatering sequencing.
- Worked on utility issues relative to ComEd and the effect of those issues on the board of Underground approval.
- Continued working on Perimeter Drilling report
- Worked on Pesticide Investigation report.
- Worked on an amendment to the Removal Action Work Plan addressing the radiological clearance of the perimeter areas and the method of handling nonradiological soils with pesticide concentrations.

II. PLANNED FOR FEBRUARY 2002

- Submit Department of Sewers permit application.
- Continue to work on the amendment to the Removal Action Work Plan including amendment to Health and Safety Plan to cover the handling of pesticide-impacted soils.
- Finalize excavation contract.

U.S. Environmental Protection Agency STS Project No. 1-25585-XG, Correspondence No. 053 February 13, 2002 Page 2

- Determine city bonding requirements with the Department of Transportation.
- Finalize pricing for the dewatering subcontractor.
- Complete and submit the perimeter area radiological drilling program report to the USEPA.
- Complete and submit the report on the pesticide test results to the USEPA.
- Continue preparation for the beginning of excavation.
- Conduct safety training for all project personnel prior to commencement of the excavation work.
- Submit an additional application to the Board of Underground covering the center line of wellpoints for dewatering.

Please contact us at 847-279-2500 with any questions you may have regarding this information.

Regards,

STS CONSULTANTS, LTD.

Richard G. Berggreen, C.P.G.

Principal Geologist

cc: Timothy Ramsey, Piper, Marbury, Rudnick & Wolfe Harold Holmberg, Kerr-McGee Mark Krippel, Kerr-McGee Bernie Bono, Kerr-McGee Thomas Pabian, Capri Capital Terry McKay, Capri Capital



STS Consultants, Ltd. Solutions through Science & Engineering

February 13 2002

Mr. Fred Micke, On-Scene Coordinator
Ms. Verneta Simon, On-Scene Coordinator
U. S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard, SE-5J
Chicago, Illinois 60604

RE: Weekly Status Report, 341 East Ohio Street Site, Chicago, Illinois - STS Project No. 1-25585-XG, Correspondence No. 052

Dear Mr. Micke and Ms. Simon:

In accordance with the Work Plan for the above-referenced site, STS Consultants, Ltd. (STS) will provide weekly updates of the work completed during the previous week and the work expected to be completed for the upcoming week. This letter presents the work completed during the week of February 4 — February 8, 2002 and the work expected during the week of February 11 — February 15, 2002.

Work Completed the Last Week

- Completed the perimeter area radiological drilling program report and furnished it to TRS, which submitted it to USEPA.
- Continued preparation of the Amended Removal Action Work Plan to address changes in the work scope and sequencing related to management of pesticide-impacted soils.
- 3. Continued preparation of the report on pesticide-impacted soils on site.
- 4. Worked on the waste profile for submittal to Waste Management.
- 5. Submitted an additional application to the Board of Underground covering the center line of wellpoints for the dewatering.

Planned for This Week

- 1. Continue preparation for the beginning of excavation.
- 2. Continue preparation of a report of pesticide-impacted soils for submittal to USEPA.
- 3. Continue to work on the Amended Removal Action Work Plan related to management of pesticide-impacted soils.
- 4. Submit waste profile to Waste Management for disposal of pesticide-impacted soils.

U.S. Environmental Protection Agency STS Project No. 1-25585-XG, Correspondence No. 052 February 13, 2002 Page 2

5. Work on utility issues relating to the ComEd vault on the site and the effect of those issues on the Board of Underground process.

Please contact me at 847-279-2450 with any questions regarding this report.

Sincerely,

STS CONSULTANTS, LTD.

Richard G. Berggreen, C.P.G.

Principal Geologist

cc. Timothy Ramsey, Piper Marbury Rudnick & Wolfe Harold Holmberg, Kerr-McGee Mark Krippel, Kerr-McGee

Bernie Bono, Kerr-McGee Thomas Pabian, Capri Capital Terry McKay, Capri Capital



January 11, 2002

Ms. Verneta Simon, On-Scene Coordinator Mr. Fred Micke, On-Scene Coordinator US Environmental Protection Agency Region 5 77 W. Jackson Blvd., SE-5J Chicago, Illinois 60604-3590

RE: Progress Report for December 2001 - 341 East Ohio Street - STS Project No. 1-25585-XG, Correspondence No. 042

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V, Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during December 2001 and activities planned or expected during January 2002.

I. PROGRESS DURING DECEMBER 2001

- Completed analysis of the TCLP test results for pesticides
- Met with TRS, Velsicol, and Kerr-McGee concerning soil materials impacted by pesticides.
- Met with USEPA, Velsicol, TRS, and Kerr-McGee to discuss options related to handling of pesticide-impacted soils during excavation.
- Prepared the draft report of results of the radiological investigation of the perimeter areas through the subsurface drilling program.
- Submitted a one-time discharge permit to the Metropolitan Water Reclamation District of Greater Chicago.
- Received additional information from AT&T Broadband to resolve utility conflicts during excavation.
- Met with Board of Underground regarding utility issues with ComEd and AT&T to be resolved before commencement of excavation.
- Continued preparation for the beginning of excavation.

II. PLANNED FOR JANUARY 2002

- Submit revised QAPP to USEPA
- Submit revised Health and Safety Plan, including additional provisions to cover the handling of pesticide-impacted soils to USEPA.

U.S. Environmental Protection Agency STS Project No. 1-25585-XG, Correspondence No. 042 January 11, 2002 Page 2

- Submit Department of Sewers permit application.
- Finalize excavation contract.
- Determine city bonding and/or damage deposit requirements.
- Finalize scope of work and pricing for the dewatering subcontractor.
- Submit the perimeter area radiological drilling program report to the USEPA.
- Submit the report on the TCLP pesticide test results to the USEPA.
- Continue preparation for the beginning of excavation.
- Conduct safety training for all project personnel prior to commencement of the excavation work.
- Work on an amendment to the Removal Action Work Plan addressing the radiological clearance of the perimeter areas and the method of handling non-radiological soils with pesticide concentrations.

Please contact us at 847-279-2500 with any questions you may have regarding this information.

Regards,

July C

STS CONSULTANTS, LTD.

Julie Apolinario
Senior Project Manager

Richard G. Berggreen, C.P.G.

M15. B52

Principal Geologist

cc: Timothy Ramsey, Piper, Marbury, Rudnick & Wolfe Harold Holmberg, Kerr-McGee Mark Krippel, Kerr-McGee

Bernie Bono, Kerr-McGee
Thomas Pabian, Capri Capital
Terry McKay, Capri Capital

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December 12, 2001

Ms. Verneta Simon, On-Scene Coordinator Mr. Fred Micke, On-Scene Coordinator US Environmental Protection Agency Region 5 77 W. Jackson Blvd., SE-5J Chicago, Illinois 60604-3590

RE: Progres

Progress Report for November 2001 - 341 East Ohio Street - STS Project No. 1-25585-XG,

Correspondence No. 032

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V, Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during November 2001 and activities planned or expected during December 2001.

I. PROGRESS DURING NOVEMBER 2001

- Collected and submitted groundwater samples for analysis to Grace Laboratory from two locations as part of the requirements for the Metropolitan Water Reclamation District of Greater Chicago's one-time discharge permit for dewatering.
- Obtained additional information on costs of dewatering system from potential dewatering subcontractors as necessary to finalize the Excavation Contract.
- Sent Nutranl Laboratory calibration samples to Argonne for calibration verification. RSSI previously completed the gamma spec analysis of these samples.
- An additional 10 RCRA hazardous waste characterization samples were collected from the vicinity
 of the former hazardous waste storage facility operated by Velsicol Chemical Company and
 submitted for analysis. Obtained totals and TCLP test results. Treatment and disposal options
 will be explored, dependent on the type and amount of contamination. Began analysis and report
 of the complete laboratory data from these borings.
- STS began preparation of a report of the radiological investigation of the site perimeter through subsurface soil borings. This report will be finalized in December 2001.
- Treatment and disposal options were explored for disposal of the mixed RCRA/radiological wastes, if any.
- Obtained Board of Underground approval for excavation

II. PLANNED FOR DECEMBER 2001

- Written approval of the revised Quality Assurance Project Plan will be requested from USEPA.
- Work on the preparation of the report of results of the radiological investigation of the perimeter areas through the subsurface drilling program.
- Submit a one-time discharge permit to the MWRDGC.
- Meet with TRS, Velsicol, and Kerr-McGee concerning soil materials impacted by pesticides.

- U.S. Environmental Protection Agency STS Project No. 1-25585-XG, Correspondence No. 032 December 12, 2001 Page 2
 - Meet with Board of Underground concerning sign-off for the site excavation, remaining issues with ComEd and A T & T must be resolved.
 - Continue preparation for the beginning of excavation.

Please contact us at 847-279-2500 with any questions you may have regarding this information.

Regards,

STS CONSULTANTS, LTD.

Julie Apolinario Senior Project Manager Pichard G. Berggreen, C.P.G.

Principal Geologist

cc: Timothy Ramsey, Piper, Marbury, Rudnick & Wolfe

Harold Holmberg, Kerr-McGee Mark Krippel, Kerr-McGee Bernie Bono, Kerr-MeGee Thomas Pabian, Capri Capital Terry McKay, Capri Capital



November 26, 2001

Ms. Verneta Simon, On-Scene Coordinator Mr. Fred Micke, On-Scene Coordinator US Environmental Protection Agency Region 5 77 W. Jackson Blvd., SE-5J Chicago, Illinois 60604-3590

RE:

Progress Report for October 2001 - 341 East Ohio Street - STS Project No. 1-25585-XG, Correspondence No. 025

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V, Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during October 2001 and activities planned or expected during November 2001.

I. PROGRESS DURING OCTOBER 2001

- The on-site laboratory was set up and the equipment calibrated. Calibration samples for the on-site laboratory were run in the on-site laboratory and the fixed laboratory at RSSI in Morton Grove, Illinois. In November, these samples will be sent to USEPA's contract laboratory at Argonne for confirmation of the calibration.
- Final revised comments on the Quality Assurance Project Plan (QAPP) were received from USEPA. These final comments are being addressed.
- RCRA hazardous waste characterization samples were obtained from areas of known radiological impact and analysis completed. STS submitted a report of such investigation.
- The Chicago Board of Underground process was completed and approval obtained for the perimeter drilling program.
- The deep perimeter drilling work was completed.

II. DATA

• Radiological data (gamma readings) have been obtained from all of the 380 perimeter borings. Data analyzed from the 191 deep perimeter borings on the east side of the site indicated no locations with elevated gamma readings. Six of the shallow perimeter borings on the north and south sides of the western portion of the site indicated elevated gamma readings as follows:

Boring	Depth (ft)	Counts/30 seconds	Cutoff Value (=7.2 pCi/gm)
North			
M.9-8.5	2.5	24,899	18,804
	3.0	25,581	18,804
N.1-10	1.5	68,291	18,059
	2.0	26,772	18,059
<u>South</u>			
A.4-3.9	1.5	23,288	18,059
A.4-5.1	1.0	33,267	18,804
A.4-4.4	1.0	28,333	18,804

U.S. Environmental Protection Agency STS Project No. 1-25585-XG, Correspondence No. 025 November 26, 2001 Page 2

	1.5	22,240	18,804
A.1-3.1	1.5	62,645	18,804
	2.0	49,889	18,804
	2.5	19,754	18,804

The 10 borings drilled for the RCRA hazardous waste sampling in the areas of known radiological impact detected six composite samples, B-1, B-2, B-4, B-5, B-8 and B-9, to exceed the cleanup threshold of 7.1 pCi/g. The full range of RCRA hazardous wastes, as well as heavy metals, was analyzed for the 10 borings. All of the metal results are below the applicable hazardous waste criteria. With the exception of Boring B-3, no chemicals were detected at levels above the RCRA characteristic hazardous waste limit for each such constituent. Boring B-3 was found to have a chlordane concentration above the hazardous waste criteria for Toxicity, per the Toxicity characteristic Leaching Procedure (TCLP) test method. The results indicated a TCLP concentration of 580 ug/L in contrast to the hazardous waste criterion of 30 ug/L. Other pesticides were detected in the sample from Boring B-3 including Endrin, Lindane, Heptachlor, and Heptachlor Epoxide. None of these were detected at levels above the RCRA characteristic hazardous waste limit for each such constituent.

III. **PLANNED FOR NOVEMBER 2001**

- Written approval of the revised Quality Assurance Project Plan will be requested from USEPA.
- An additional 10 RCRA hazardous waste characterization samples will be collected from the vicinity of the former hazardous waste storage facility operated by Velsicol Chemical Company and submitted for analysis. Based on the results of these samples, the wastes will be delineated, or additional samples will be taken, to determine the extent of RCRA contamination. Treatment and disposal options will be explored, dependent on the type and amount of contamination.
- Samples used for calibration during set up of the on-site laboratory will be sent to Argonne for confirmation of the calibration.
- STS will work on preparation of a report of the radiological investigation of the site perimeter through subsurface soil borings. This report will be finalized in December 2001.
- City of Chicago approval for any necessary closures of adjacent streets and sidewalks will be requested.
- Treatment and disposal options will be explored for disposal of the RCRA materials and any mixed RCRA/radiological wastes.
- Scope and costs of the dewatering system necessary for the eastern portion of the site will be further evaluated as necessary to finalize the Excavation Contract.

Please contact us at 847-279-2500 with any questions you may have regarding this information.

Regards,

cc:

STS CONSULTANTS, LTD.

Julie Apolinarid

Senior Project Manager

Richard G. Berggreen, C.P.G.

TUS. Boso

Principal Geologist

Timothy Ramsey, Piper, Marbury, Rudnick & Wolfe Harold Holmberg, Kerr-McGee

Mark Krippel, Kerr-McGee Bernie Bono, Kerr-MeGee Thomas Pabian, Capri Capital

Terry McKay, Capri Capital



October 10, 2001

Ms. Verneta Simon, On-Scene Coordinator Mr. Fred Micke, On-Scene Coordinator US Environmental Protection Agency Region 5 77 W. Jackson Blvd., SE-5J Chicago, IL 60604-3590

RE:

Progress Report for August and September 2001 – 341 East Ohio Street

STS Project No. 1-25585XG

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) as Authorized Project Coordinator for Teachers' Retirement System of the State of Illinois (TRS), submits the following report to USEPA Region 5 in compliance with Section V, Paragraph 3.4 of the Unilateral Administrative Order (Order), Docket No. V-W-96-C-353, issued June 6, 1996, as amended by the First Amendment to that Order dated March 29, 2000 and as supplemented by the Action Memorandum Amendment dated March 1, 2001 for the OU3 North McClurg Court Site (341 East Ohio Street). This progress report identifies actions taken during August and September, 2001 and activities planned or expected during October, 2001.

I. PROGRESS DURING AUGUST AND SEPTEMBER, 2001

- Site mobilization was begun in August, 2001, with site fencing and project signs in place. Empty transport shipping containers have been staged to the site.
- Fifty-four shallow borings were completed in August, 2001 as part of the perimeter drilling program.
- The on-site laboratory was set up and the equipment calibrated. Calibration will continue with samples being run at RSSI and Argonne for comparison.
- The Quality Assurance Project Plan (QAPP), including revisions in response to USEPA review comments, was submitted for approval.
- RCRA hazardous waste characterization samples were obtained and analysis completed. STS commenced preparation of the report of such investigation.
- A request for existing utility protection for the site excavation plan was submitted to the Chicago Department of Transportation.
- The five meter grid signs to delineate the sampling grid were installed.
- Invitations for Bid and Bid Specifications were submitted to six prospective contractors for the excavation work. Bids were received from three of the prospective contractors.

II. DATA

- Data analyzed from the 54 completed shallow borings indicated 5 locations with elevated gamma readings; three on the southwest side of the site, and two on the northwest side of the site.
- RCRA waste characterization results will be submitted under separate cover.

III. PLANNED FOR OCTOBER, 2001

- Written approval of the revised Quality Assurance Project Plan will be requested from USEPA.
- Samples generated during set up of the on-site laboratory will be sent to Argonne for calibration.

U.S. Environmental Protection Agency STS Project No. 1-25585-XG October 10, 2001 Page 2

- The Chicago Board of Underground process is expected to be completed which will identify any
 City or utility requirements for utility protection in connection with the completion of the perimeter
 drilling work and the excavation work.
- The deep perimeter drilling work will be completed.
- On the basis of the results of the perimeter drilling, an evaluation will be made of whether an earth retention system will be required to support adjacent sidewalks and rights of way.
- City of Chicago approval for any necessary closures of adjacent streets and sidewalks will be requested.
- The RCRA hazardous waste characterization sampling report will be submitted to USEPA.
- Further evaluation will be made of the need for any additional RCRA hazardous waste investigation.
- Evaluation will be made of the effect of the presence of RCRA hazardous wastes on the transport
 and disposal of hazardous materials, including determination of whether any radiological materials
 are subject to treatment requirements before being shipped to the Envirocare facility in Utah.
- Radiation and safety training will be completed for all on-site personnel prior to excavation
 activities.
- The Excavation Contract with the excavation contractor is expected to be executed.
- Provided all appropriate regulatory approvals and determinations are provided and completed, excavation activities are expected to begin.

Please contact us at 847.279.2500 with any questions you may have regarding this information.

Regards,

STS CONSULTANTS, LTD.

Julie Apolinario

Senior Project Manager

Richard G. Berggreen, C.P.G.

Tel 9. Bys -

Principal Geologist

cc: Timothy Ramsey, Piper, Marbury, Rudnick & Wolfe

Harold Holmberg, Kerr-McGee Mark Krippel, Kerr-McGee

Bernie Bono, Kerr-McGee

Bernie Bono, Ken-wedee

Thomas Pabian, Capri Capital

Terry McKay, Capri Capital